

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD SNOWDEN,

Defendant,

and

MACMILLAN PUBLISHING GROUP, LLC
d/b/a HENRY HOLT AND COMPANY, *et*
al.,

Relief-Defendants.

Case No. 1:19-cv-1197-LO-TCB

NOTICE OF CORRECTION

Defendant Snowden, by counsel, respectfully files this notice of correction to confirm his understanding that *United States v. Marchetti*, 466 F.2d 1309 (4th Cir. 1972), was thereafter limited by the Fourth Circuit’s decision in *Alfred A. Knopf, Inc. v. Colby*, 509 F.2d 1362, 1370 (4th Cir. 1975), clarifying that something is not in the “public domain” unless there has been “official disclosure” by the government. Mr. Snowden’s argument that *Marchetti*, without reference to this limitation, requires a particular reading of the Secrecy Agreements is withdrawn. *See* ECF No. 51 at 2, 17, 24. Counsel apologize for the oversight, which is being corrected immediately on being perceived. In all other regards, including other citations to *Marchetti*, Mr. Snowden stands on his opposition brief of record.

Dated: November 27, 2019

Respectfully submitted,

Edward Snowden (*by Counsel*)

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of November, 2019, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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